

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Gregory S. Kinoian, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
gkinoian@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 467-2700
Fax: (973) 467-8126

Proposed Local Counsel to the Official Committee of Talc Claimants

BROWN RUDNICK LLP

David J. Molton, Esq.
Robert J. Stark, Esq.
Michael S. Winograd, Esq.
Eric R. Goodman, Esq.
dmolton@brownrudnick.com
rstark@brownrudnick.com
mwinograd@brownrudnick.com
egoodman@brownrudnick.com
Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
Fax: (212) 209-4801

and

Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
Fax: (617) 856-8201

Proposed Co-Counsel for the Official Committee of Talc Claimants

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
jmassey@masseygail.com
1000 Maine Ave. SW, Suite 450
Washington, DC 20024
Tel: (202) 652-4511
Fax: (312) 379-0467

Proposed Special Counsel for the Official Committee of Talc Claimants

OTTERBOURG PC

Melanie L. Cyganowski, Esq.
Adam C. Silverstein, Esq.
Jennifer S. Feeney, Esq.
mcyganowski@otterbourg.com
asilverstein@otterbourg.com
jfeeney@otterbourg.com
230 Park Avenue
New York, NY 10169
Tel: (212) 905-3628
Fax: (212) 682-6104

Proposed Co-Counsel for the Official Committee of Talc Claimants

In Re:	Chapter 11
LTL MANAGEMENT, LLC,	Case No.: 23-12825 (MBK)
Debtor.	Honorable Michael B. Kaplan

**NOTICE OF MOTION TO SEAL THE REDACTED PORTIONS OF THE
OFFICIAL COMMITTEE OF TALC CLAIMANTS' OBJECTION
TO DEBTOR'S MOTION FOR AN ORDER APPOINTING RANDI S.
ELLIS AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants (the “**TCC**” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “**LTL**”), by and through its proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of the *Official Committee of Talc Claimants' Objection to Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “**Objection**”), filed substantially contemporaneously herewith,¹ in response to the *Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “**FCR Appointment Motion**”) [Docket No. 87], and (B) granting the Committee such other and further

¹ A redacted version of the Objection has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)).

relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, substantially contemporaneously with the filing of the Motion to Seal, the Committee has also filed an *Application for Order Shortening Time and Certain Other Relief* (the “**Scheduling Application**”) requesting that the hearing on the Motion to Seal be scheduled contemporaneously with the Debtor’s FCR Appointment Motion, which is currently scheduled to be heard on May 3, 2023 at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received in accordance with the Court’s order entered with respect to the Scheduling Application.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: April 26, 2023

GENOVA BURNS LLC

By: /s/ Gregory S. Kinoian

Daniel M. Stoltz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: DStoltz@genovaburns.com

DClarke@genovaburns.com

GKinoian@genovaburns.com

Proposed Local Counsel for the Official Committee of Talc Claimants